

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Mother Doe, individually and as the	)	
Mother and Natural Guardian for Jane	)	C.A. No. 3:18-cv-02731-CMC
Doe, a minor,	)	
	)	
Plaintiff,	)	<b>DEFENDANT RICHLAND COUNTY</b>
	)	<b>SCHOOL DISTRICT TWO'S RULE</b>
vs.	)	<b>26(a)(3) PRE-TRIAL DISCLOSURES</b>
	)	
Richland County School District Two,	)	
Sheriff of Richland County in his official	)	
capacity d/b/a Richland County Sheriff's	)	
Department ("RCSD"), John E. Ewing,	)	
and Jamel Bradley,	)	
	)	
Defendants.	)	
	)	

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Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, Defendant Richland School District Two ("Defendant School District") hereby submits the following pretrial disclosures:

(A) The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises.

**Defendant School District expects to present:**

- a. **Dr. Baron Davis, Superintendent**  
**Richland School District Two**  
**763 Fashion Drive**  
**Columbia, SC 29229**  
**(803) 787-1910**
  
- b. **Dr. Keith Price, Assistant Superintendent**  
**Richland School District Two**  
**763 Fashion Drive**  
**Columbia, SC 29229**

**(803) 787-1910**

- c. **Cleveland J.C. Smith, Chief Administrative Services Officer**  
**Richland School District Two**  
**6831 Brookfield Road**  
**Columbia, SC 29206**  
**(803) 738-3228**
- d. **Jeff Temoney, Principal**  
**Spring Valley High School**  
**120 Sparkleberry Lane**  
**Columbia, SC 29229**  
**(803) 699-3500**
- e. **Stacy Baker, Assistant Principal**  
**Spring Valley High School**  
**120 Sparkleberry Lane**  
**Columbia, SC 29229**  
**(803) 699-3500**
- f. **Paul Dobyns, Assistant Principal**  
**Spring Valley High School**  
**120 Sparkleberry Lane**  
**Columbia, SC 29229**
- g. **Sean Glover, Assistant Principal**  
**Spring Valley High School**  
**120 Sparkleberry Lane**  
**Columbia, SC 29229**  
**(803) 699-3500**
- h. **Schiria Wilson, Work Based Learning Coordinator**  
**Spring Valley High School**  
**120 Sparkleberry Lane**  
**Columbia, SC 29229**  
**(803) 699-3500**
- j. **April Shell, Principal**  
**Summit Parkway Middle School**  
**200 Summit Parkway**  
**Columbia, SC 29229**  
**(803) 699-3580**
- k. **Donna S. Maddox, MD, LLC**  
**115 Carter Woods Drive**  
**Anderson, SC 29261**

- l. Jody Shipper  
Co-Founder and Managing Director  
Grand Rivers Solutions, Inc.  
P.O. Box 2094  
Saratoga, CA 95070**
- m. Traci Batchelder, former Director of Classified Employees and Employees Services>Title IX Coordinator  
105 Clarmont Court  
Lexington, SC 29072**
- n. Debra Hamm, former Superintendent  
193 Congaree Park Drive  
West Columbia, SC 29169**

**Defendant School District may call if the need arises:**

- a. Captain John Ewing  
Richland County Sheriff's Department  
5623 Two Notch Road  
Columbia, SC 29223  
(803) 576-3000**
- b. Deputy Jamel Bradley  
Richland County Sheriff's Department  
5623 Two Notch Road  
Columbia, SC 29223  
(803) 576-3000**
- c. Sheriff Leon Lott  
Richland County Sheriff's Department  
5623 Two Notch Road  
Columbia, SC 29223  
(803) 576-3000**
- d. Susan Yelverton  
Palmetto Adolescent Recovery Center  
720 Gracern Road, Suite 104  
Columbia, SC 29210**
- e. Jennifer Heath, MD  
1415 Blanding Street  
Columbia, SC 29201**
- f. Mia Davidian, MD**

**Moncrief Army Health Clinic  
4500 Stuart Street  
Columbia, SC 29207**

- g. **Dr. Benita Marie Cunningham  
Moncrief Army Health Clinic  
4500 Stuart Street  
Columbia, SC 29207**
- h. **Allison M. Foster, PHD  
Metropolitan Children's Advocacy Center  
3710 Landmark Drive, Suite 300  
Columbia, SC 29204**
- i. **Heidi Jackson  
Richland County Sheriff's Department  
5623 Two Notch Road  
Columbia, SC 29223  
(803) 576-3000**
- j. **Mother Doe**
- j. **Jane Doe**

**In addition, Defendant School District reserves the right to call witnesses identified by Plaintiff and Co-Defendants and to supplement this list, as appropriate.**

(B) The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony.

**None at this time.**

(C) An appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

**Defendant School District expects to offer, or may offer if the need arises, the following, or a portion thereof:**

<b>DOCUMENT DESCRIPTION</b>	<b>BATES LABEL</b>	<b>SOURCE</b>
Notes of Stacey Baker	00001-00004	District
School Records of Jane Doe	00005-00055, 01674-01845, 03284	District
Letter from Smith to Ewing dated 12/17/18	00056	District
SRO 2018-2019 Assignments	00057-00064	District
SRO Memorandum of Agreement	00065-00076	District
2016-17 Back-2-School Handbook	00087-00130	District
2017-18 Back-2-School- Handbook	00131-00178	District
2018-19 Back-2-School Handbook	00179-00226	District
Email Communications between Jane Doe and Stacey Baker dated 4/18/19-4/19/19	000281	District
Emails between Jane Doe and S. Baker dated 5/7/18, 5/14/18, 5/23/18, 6/6/18, 6/7/18 and 8/8/18	00275, 00272, 00268-00269 00233-00235, 00449-00452 1299-1304	District
Emails between Mother Doe and S. Baker dated 5/21/18, 4/17/18, and 3/22/18	00301, 00446, 000434-00435 01345-01346	District
Emails between Mother Doe and Jane Doe	00297, 00453-00454	District
Emails from S. Catoe	00291-00291	District
Emails between S. Baker and H. Jackson and C. Lindler	00303-00305 00322-00326 01307-1341	District
Communications with H. Jackson and C. Lindler	00312-00326	District
Email communications with S. Yelverton	00327-00358	District
District Policies	00360-00378	District
Email communications between Jane Doe and Bradley (February 2017-March 2018)	00379-00412	District
Emails from Jane Doe to J. Temoney	00429-00430	
SVHS Training Documentation	00455-00485	District
SVHS SRO Evaluation Documentation	00638-00683	District
Email communications between the District and R.M. re. 2016 allegations	00694-00719	District
Communications between District and RCSD re. 2016 allegation from R.M.	00720-00742	District
SRO Assignments	00743-00774	District
January 2019 communications between Smith and Ewing	00778-00780 01342-01344	District
Correspondence and documents re. SRO	00916-01066	District

Assignments (2013-2019)		
Communications from Bradley re. C.E. (February – March 2016)	01067-01072	District
Email communications between Bradley and students (May 2016)	01073-01074	District
Email communications between Bradley and J.W. (February – May 2016)	01075-01077	District
Emails between Bradley and C.E. (October 2015-May 2016)	01078-01145	District
Communications between RCSD and District re. R.M.’s 2016 allegations	01146-01168	District
Emails between Bradley and Jane Doe (September 2017-March 2018)	01169-01219	District
May 2016 District communications re: R.M. allegations	01220-01224	District
March 21, 2018 email exchange between Temoney and parent	01225-01228	District
Communications between Baker and S. Yelverton (April – May 2018)	01229-01294	District
March 2015 emails between Baker and F. Robinson	01295-01296	District
Emails between E. Hawkins and D. Stiffer re: Jane Doe	01297	District
Emails between J. Bradley and M. Kelly re: Jane Doe	01298	District
8/7/18 Emails between Temoney and Bradley re: Placement	01347-01349	District
1/30/19 Emails between C. Smith and K. Beaman re: DARE	01350-01351	District
9/20/18 Email from Bradley re: DARE	01352	District
Notes from P. Dobyns	01353	District
12/4/15 Emails between C.E. and A. Shell	01354-01355	District
12/5/15 Emails between A. Shell and S. Marcotte	01356	
10/20/17 News Article (The State)	01357-01362	District
Documentation re: Title IX training	01363-01673	District
Student Sexual Abuse Training Records	01846-02214	District
Jane Doe’s homebound records	02215-02226	District
October 2019 Email communications and Letters of Recommendation from J. Temoney	02227-02237	District
Subpoenaed records from Prisma Health Richland re: Jane Doe	02238-03160 03285-03782	District
Records re: Bradley’s SRO Assignments (2018-2019)	03161-03170	District

Emails between C. Smith and J. Ewing dated 5/17/18	03198-03199	District
Google Calendar Notification	03200-03202	District
Documentation re: Bradley's assignments (2010-2019)	03208-03277	District
Notes from S. Baker (11/14/19-11/15/19)	03278-03279	District
Subpoenaed records from Children's Advocacy Center re: Jane Doe	03783-03792	District
Report of Dr. Donna Maddox	03793-03798	District

DOCUMENT DESCRIPTION	BATES LABEL	SOURCE
SC Criminal Justice Academy Records of Jamel Bradley	a.	Plaintiffs
Hearing transcript of Doe v. Richland County Sheriff's Department (10/30/18)	b.	Plaintiffs
Richland County Sheriff Department's previous Internal Affairs records of Jamel Bradley	c.	Plaintiffs
Richland County Sheriff's Department personnel file of Jamel Bradley	d.	Plaintiffs
Internal Affairs file of Jamel Bradley	e.	Plaintiffs
Criminal Investigation file of the Richland County Sheriff's Department of Jamel Bradley	f.	Plaintiffs
Richland County Sheriff's Department polygraph records of Jamel Bradley, including video recording	g.	Plaintiffs
Video interview of Jane Doe (04/18/18)	h.	Plaintiffs
Video interview of Jane Doe (04/20/18)	i.	Plaintiffs
FOIA Request to Richland County School District	j.	Plaintiffs
Voicemail to Mother Doe from Stacey Baker	k.	Plaintiffs
Voicemail to Mother Doe from Jeff Temoney	l.	Plaintiffs
Confidential medical records of Palmetto Health of Jane Doe	m.	Plaintiffs
Confidential medical records of Metropolitan Children's Advocacy Center of Jane Doe	n.	Plaintiffs
South Carolina 10 year driving record of Jamel Bradley	o.	Plaintiffs
Preemployment polygraph report and chart of Deputy Bradley	p.	Plaintiffs

Criminal investigation polygraph report and chart of Deputy Bradley	q.	Plaintiffs
Confidential records of Moncrief Army Health Clinic of Jane Doe	r.	Plaintiffs
Verizon records for (803) 319-7608 obtained by way of Plaintiff subpoena	s.	Plaintiffs
Verizon records for (803) 518-7968 obtained by way of Plaintiff subpoena	t.	Plaintiffs
Affidavit and Curriculum Vitae of Daniel Swinton	u.	Plaintiffs
Affidavit and Curriculum Vitae of Julie Duff	v.	Plaintiffs
Affidavit and Curriculum Vitae of Amanda Salas, MD	w.	Plaintiffs
Affidavit and Curriculum Vitae of Roy Taylor	x.	Plaintiffs
Medical billing of Prisma Health Baptist Hospital	z.	Plaintiffs
Subpoena response of Richland One General Counsel, Susan G. Williams	aa.	Plaintiffs
Updated records received from the South Carolina Criminal Justice Academy on 11/27/2019	bb.	Plaintiffs
Richland County Public Access Offender Information of Jamel Bradley 11/20/2019	bb.	Plaintiffs
Press statement of Sheriff Lott on 11/20/2019	cc.	Plaintiffs

DOCUMENT DESCRIPTION	BATES LABEL	SOURCE
James Bradley personnel file	00432-A-001 through 00432-A-139	RCSD, Ewing, and Bradley
Previous Internal Affairs history	00432-B-001 through 00432-B-039	RCSD, Ewing, and Bradley
2018 Internal Affairs file	00432-C-001 through 00432-C-016	RCSD, Ewing, and Bradley
Captain Ewing's written statement	00432-C-004 through 00432-C-006	RCSD, Ewing, and Bradley
Criminal Investigation	00432-D-001 through 00432-D-061	RCSD, Ewing, and Bradley
Deputy Bradley's written statement	00432-D-018 through 00432-D-026	RCSD, Ewing, and Bradley
No. 101: Department Organization	00432-E-001 through 00432-E-007	RCSD, Ewing, and Bradley
No. 104: Internal Affairs Investigation Procedures	00432-E-008 through 00432-E-012	RCSD, Ewing, and Bradley

No. 105: Rules and Regulations	00432-E-032 through 00432-E-033	RCSD, Ewing, and Bradley
No. 201: Recruitment and Selection	00432-E-034 through 00432-E-037	RCSD, Ewing, and Bradley
SRO Division file re Jamel Bradley	00432-F-001 through 00432-F-029	RCSD, Ewing, and Bradley
Jamel Bradley's training file	00432-G-001 through 00432-G-072	RCSD, Ewing, and Bradley
John Ewing's training file	00432-H-001 through 00432-H-261	RCSD, Ewing, and Bradley
John Ewing's Internal Affairs file	00432-I-001 through 00432-I-055	RCSD, Ewing, and Bradley
No. 509: Field Training Officer Program	00432-J-001 through 00432-J-018	RCSD, Ewing, and Bradley
No. 1800: SRO School-Related Disability	00432-J-019 through 00432-J-026	RCSD, Ewing, and Bradley
John Ewing Personnel file	00432-K-001 through 00432-K-317	RCSD, Ewing, and Bradley
Polygraph report	00432-L-001 through 00432-L-0013	RCSD, Ewing, and Bradley
Polygraph examination	00432-M-001 through 00432-M-0018	RCSD, Ewing, and Bradley
Memo: Lindler to Lott re investigation decision	00432-N-001 through 00432-N-002	RCSD, Ewing, and Bradley
Memorandum of Agreement re. SRO program	00432-O-001 through 00432-O-073	RCSD, Ewing, and Bradley
Memorandum of Agreement re. SRO program	00432-O-074 through 00432-O-085	RCSD, Ewing, and Bradley
SRO Ben Fields' personnel and training file	00432-P-001 through 00432-P-280	RCSD, Ewing, and Bradley
SRO Ben Fields' personnel and training file (2)	00432-Q-001 through 00432-Q-112	RCSD, Ewing, and Bradley
Compliance Review Resolution (8/10/16)	00432-R-001 through 00432-R-025	RCSD, Ewing, and Bradley
Compliance Review Notice of Closure (9/30/19)	00432-S-001 through 00432-S-005	RCSD, Ewing, and Bradley
Additional documentation re. Defendant Bradley's personnel file	00432-T-001 through 00432-T-023	RCSD, Ewing, and Bradley
Additional documentation re. Defendant Ewing's training file	00432-U-001	RCSD, Ewing, and Bradley
Additional documentation re. Defendant Bradley's training file	00432-V-001	RCSD, Ewing, and Bradley
IA investigation records re. Bradley (Ellis)	00432-W-001 through 00432-W-012	RCSD, Ewing, and Bradley
Video: April 18, 2018 interview of Jane Doe [2:27:49 length]		RCSD, Ewing, and Bradley

Video: April 20, 2018 polygraph interview of Jamel Bradley [1:22:28 length]		RCSD, Ewing, and Bradley
Video: April 20, 2018 forensic interview of Jane Doe [2:24:54 length]		RCSD, Ewing, and Bradley

**Defendant School District reserves the right to modify, amend, or supplement these disclosures as permitted by the Court and applicable rules and include any exhibits produced in discovery and made part of depositions.**

Respectfully submitted,

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Attorneys for Defendants Richland County  
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May 18, 2020  
Columbia, South Carolina